

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**CAROLYN WITT, *et al.***

**Plaintiffs,**

**v.**

**Civil Action No. 3:15cv00386-REP**

**CORELOGIC SAFERENT, LLC,**

**Defendant.**

**DEFENDANT'S MOTION TO DISMISS  
OR, IN THE ALTERNATIVE, TO TRANSFER VENUE**

Defendant, CoreLogic SafeRent, LLC, by counsel, and pursuant to Fed. R. Civ. P. 12(b)(2), 12(b)(3), 12(b)(6), and 28 U.S.C. § 1406(a), submits this Motion to Dismiss, or in the Alternative, to Transfer Venue. The reasons in support of the motion are set forth in the accompanying memorandum.

WHEREFORE, CoreLogic SafeRent, LLC respectfully requests that the Court enter an order (1) dismissing this case with prejudice with respect to Plaintiffs Henderson and Hines; (2) dismissing the case for lack of personal jurisdiction with respect to the claims of Plaintiff Moore; (3) dismissing the claims of the fourteen Newly Named Plaintiffs; and (4) dismissing the remaining claims for improper venue.

**CORELOGIC SAFERENT, LLC**

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of September, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

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